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12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 \$191,787.00 IN U.S. CURRENCY,

19 Defendant.

20 EDGAR MASSIAN AND  
21 ALBERT TOVMASYAN,

22 Claimants.  
23

No. CV 16-1960-SVW (AGR)

~~PROPOSED~~

CONSENT JUDGMENT

**JS-6**

24 This action was filed on March 22, 2016 against \$191,787.00 seized on or about  
25 August 12, 2015, during the execution of a State of California search warrant at 5232  
26 West Sunset Boulevard, Los Angeles, California ("defendant currency"). Notice has  
27 been given and published in accordance with law. Claimants Edgar Massian  
28 ("Massian") and Albert Tovmasyan ("Tovmasyan") filed a claim on May 16, 2016 and

1 an answer on June 6, 2016. No other potential claimant has filed a claim or answer, and  
2 the time for filing claims and answers has expired. Plaintiff United States of America,  
3 Massian and Tovmasyan have reached an agreement that is dispositive of the action and  
4 have requested that this consent judgment be entered. Nothing in this consent judgment  
5 is intended or should be interpreted as an admission of wrongdoing by Massian or  
6 Tovmasyan.

7 WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:

8 A. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345  
9 and 1355 and over the parties hereto.

10 B. The Complaint for Forfeiture states a claim for relief pursuant to 21 U.S.C.  
11 § 881(a)(6).

12 C. Notice of this action has been given in accordance with law. All potential  
13 claimants to the defendant currency other than Massian and Tovmasyan are deemed to  
14 have admitted the allegations of the Complaint. The allegations set out in the Complaint  
15 are sufficient to establish a basis for forfeiture.

16 D. \$10,000.00 of the defendant currency shall be returned to Massian and  
17 Tovmasyan without interest and shall be paid to Massian and Tovmasyan no later than  
18 forty-five days after the date this Judgment is entered, or the date Massian and  
19 Tovmasyan provide the information described below, whichever is later.

20 E. If the United States elects to make the payment by check, the check will be  
21 payable to the "Tahmazian Law Firm Client Trust Account." If the United States elects  
22 to make the payment by wire transfer, the funds will be wire transferred to the  
23 Tahmazian Law Firm Client Trust Account. Massian and Tovmasyan agree to provide  
24 the necessary bank account information and personal identifiers for the trust account  
25 upon request from the United States.

26 F. The United States of America shall have judgment as to the remaining  
27 \$181,787.00 of the defendant currency, together with all interest earned by the  
28

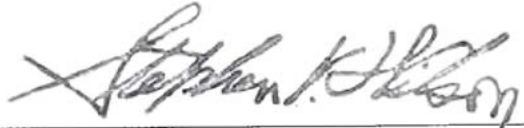
1 government on the entire amount of the defendant currency since seizure, and no other  
2 person or entity shall have any right, title or interest therein.

3 G. Massian and Tovmasyan have agreed to release the United States of  
4 America, its agencies, agents, officers, employees and representatives, including, without  
5 limitation, all agents, officers, employees and representatives of the Drug Enforcement  
6 Administration and the Department of Justice, as well as all agents, officers, employees  
7 and representatives of any state or local governmental or law enforcement agency  
8 involved in the investigation or prosecution of this matter, from any and all claims  
9 (including, without limitation, any petitions for remission, which Massian or Tovmasyan  
10 hereby withdraw), actions or liabilities arising out of or related to this action, including,  
11 without limitation, any claim for attorney fees, costs and interest, which may be asserted  
12 by or on behalf of Massian or Tovmasyan, whether pursuant to 28 U.S.C. § 2465 or  
13 otherwise.



1 H. The Court finds that there was reasonable cause for the institution of these  
2 proceedings. This Judgment shall be construed as a certificate of reasonable cause  
3 pursuant to 28 U.S.C. § 2465.

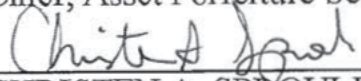
4  
5 Dated: June 7, 2017

  
THE HONORABLE STEPHEN V. WILSON  
UNITED STATES DISTRICT JUDGE

7 **Approved as to form and content:**

8  
9 DATED: <sup>June 5</sup>~~May~~, 2017

SANDRA R. BROWN  
Acting United States Attorney  
LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
Chief, Criminal Division  
STEVEN R. WELK  
Assistant United States Attorney  
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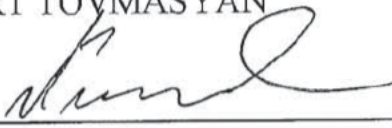
Attorneys for Plaintiff  
United States of America

16  
17 DATED: May <sup>31</sup>, 2017

  
JILBERT TAHMAZIAN, ESQ.

Attorney for Claimants  
EDGAR MASSIAN and  
ALBERT TOVMASYAN

20  
21 DATED: May <sup>31</sup>, 2017

  
EDGAR MASSIAN  
Claimant

23  
24 DATED: May <sup>31</sup>, 2017

  
ALBERT TOVMASYAN  
Claimant